

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AMSELFILM PRODUCTIONS	:	
GMBH & CO. KG,	:	Civil Action No. 2:12-CV-03864
Plaintiff,	:	
	:	
v.	:	
	:	
SWARM BB012,	:	
JOHN DOES 1-997,	:	<u>NOTICE OF MOTION</u>
Defendants.	:	

**TO: Jay R. McDaniel
McDaniel Law Firm, P.C.
54 Main Street
Hackensack, NJ 07601**

**Ronald Kalish
Steinberg, Goodman & Kalish
20 N. Clark St., 31st Floor
Chicago, IL 60602**

**Michael Mignogna
Mattleman, Weinroth & Miller, P.C.
401 Route 70 East, Suite 100
Cherry Hill, NJ 08034**

PLEASE TAKE NOTICE, that on Thursday, October 11, 2012, or as soon thereafter as the Court will order, Michael Mignogna, a member in good standing of the Bar of the State of New Jersey representing John Doe IP #76.31.66.82, of the law firm of Mattleman, Weinroth & Miller, P.C., will move before this Honorable Court for an order permitting Ronald Kalish, an attorney with the law offices of Steinberg, Goodman & Kalish to practice *pro hac vice* before the United States District Court for the District of New Jersey to represent John Doe of IP Address #24.15.69.53 pursuant to Local Civil Rule 101.1 of the United States District Court for the District of New Jersey in the above-captioned matter. Moving Defendant, John Doe IP #24.15.69.53, by and through his attorney to be admitted *pro hac vice*, Ronald Kalish, of Steinberg, Goodman & Kalish, will also move before this

Honorable Court to join the Brief filed by John Doe #76.31.66.82 and for an order granting the Motion to Quash Plaintiff's Rule 45 Subpoena, or in the alternative, granting the Motion to Sever and Dismiss Pursuant to Rule 21 in the above-captioned matter.

Your response hereto is due within the applicable time period provided by the Federal Rules of Civil Procedure.

Mattleman, Weinroth & Miller, P.C.

BY: /s Michael Mignogna, Esq.
Michael Mignogna, Esq.
Counsel for Defendant
Bar # 85050
Mattleman, Weinroth & Miller,
P.C.
401 Route 70 East, Suite 100
Cherry Hill, NJ 08034
Phone: 856.429.5507
E-mail: mmignogna@mwm-law.com

DATE: October 11, 2012

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MATTELEMAN WEINROTH & MILLER, P.C.
401 Route 70 East, Suite 100
Cherry Hill, NJ 08034

Amselfilms Productions GMBH & Co. KG,

Plaintiff,

v.

Swarm BB012 & John Does 1-997,

Defendants.

Civil Action No.: 2:12-cv-03864 FSH-PS

Honorable Faith S. Hochberg

**APPLICATION TO APPEAR PRO HAC VICE
PURSUANT TO D.N.J.L. CIV. R. 101.1**

Michael R. Mignogna (the "Movant"), a member in good standing of the Bar of the State of New Jersey and an attorney admitted to practice before the United States District Court for the District of New Jersey, and an attorney in the law firm of Mattleman, Weinroth & Miller, P.C. , hereby moves the Court to enter an order permitting Ronald Kalish (the "Admittee"), an attorney with the law offices of Steinberg, Goodman & Kalish to practice pro hac vice before the United States District Court for the District of New Jersey and to represent John Doe of IP Address # 24.15.69.53 ("Doe 24.15.69.53") in this case, pursuant to Local Civil Rule 101.1 of the United States District Court for the District of New Jersey. In support of this Application the Movant says:

1. Ronald Kalish is a member in good standing of the Bar(s) of the State Illinois and is admitted to practice before the United States District Court for the District of Illinois and is not currently under any suspension or subject to other disciplinary action with respect to his practice.
2. Ronald Kalish have been a member of the Bar of the State of Illinois since 1992 and has been admitted to practice before the United States District Court for the Northern District of Illinois since December 1992. The roll of members of the Illinois bar is kept by:
Clerk of the Supreme Court
Supreme Court Building
200 East Capitol
Springfield, Illinois 62701-1721
3. Attached as Exhibit A is the Affirmation of the Admittee.
4. Movant requests that this Court allow this Motion so that the Admittee can join the Motion filed by Movant on behalf John Doe of IP Address #

76.31.66.82 and file pleadings and appear and be heard at any hearings in this case.

5. No previous motion has been made for the relief sought herein.
6. Notice of this Application has been given to all parties entering an appearance in this case. In light of the nature of the relief requested, the Movant submits that no further notice is required.

WHEREFORE, Movant requests entry of the attached order and such other relief as the Court deems equitable and just.

Respectfully submitted this 11th day of October 2012.

MATTLEMAN WEINROTH & MILLER, PC.

/s/ Michael R. Mignogna
Michael R. Mignogna
Mattleman, Weinroth & Miller, P.C.
401 Route 70 East, Suite 100
Cherry Hill, NJ 08034
856-429-5507
856-428-5482 (F)
Email: mmignogna@mwm-law.com

Local counsel for Doe 24.15.69.53

EXHIBIT A

AFFIRMATION OF RONALD KALISH

I affirm that I am eligible for admission to this Court, am admitted to practice in the jurisdictions specified in the Application, and am in good standing in such jurisdictions. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the Court pursuant to Local Rule 101.1(c) of the United States District Court for the District of New Jersey, and I have access to or have acquired a copy of the Local Rules of this Court and am familiar with such rules.

Dated this 2nd day of October, 2012.

STEINBERG, GOODMAN & KALISH

/s/ Ronald Kalish

Ronald Kalish

Steinberg, Goodman & Kalish

20 N. Clark St., 31st Floor

Chicago, IL 60602

(312)782-1386

(312) 782-6739 (f)

Counsel for Doe 24.15.69.53

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MATTELEMAN WEINROTH & MILLER, P.C.
401 Route 70 East, Suite 100
Cherry Hill, NJ 08034

Amselfilms Productions GMBH & Co. KG,

Plaintiff,

v.

Swarm BB012 & John Does 1-997,

Defendants.

Civil Action No.: 2:12-cv-03864 FSH-PS

Honorable Faith S. Hochberg

CERTIFICATION OF SERVICE

I hereby certify, under penalty of perjury, that a true and correct copy of the Application to Appear Pro Hac Vice Pursuant to D.N.J.L. Civ. R. 101.1 was caused to be served on the parties on the attached Service List in the manner listed on this day October 11, 2012.

Dated this 11th day of October 2012.

MATTLEMAN WEINROTH & MILLER, PC.

/s/ Michael R. Mignogna

Michael R. Mignogna

Mattleman, Weinroth & Miller, P.C.

401 Route 70 East, Suite 100

Cherry Hill, NJ 08034

856-429-5507

856-428-5482 (F)

Email: mmignogna@mwm-law.com

Local counsel for Doe 24.15.69.53

SERVICE LIST

JAY R. MCDANIEL MCDANIEL LAW FIRM, P.C. 54 MAIN STREET HACKENSACK, NJ 07601 Via Facsimile 201-845-3777 and Email jrmcdaniel@mcdlawpc.com	

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MATTELEMAN WEINROTH & MILLER, P.C.

401 Route 70 East, Suite 100
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Amselfilms Productions GMBH & Co. KG,

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ORDER ADMITTING RONALD KALISH PRO HAC VICE

The relief set forth on the following pages is hereby **ORDERED**.

This matter having been brought before the Court on the application for an Order for Admission *Pro Hac Vice*; and the Court having reviewed the moving papers of the application, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Pro 78, D.N.J.L. Civ. R. 101.1, and good cause having been shown; it is

ORDERED that Ronald Kalish of Steinberg, Goodman & Kalish, 20 N. Clark St., 31st Floor, Chicago, IL 60602 be permitted to appear *pro hac vice*; provided that pursuant to D.N.J.L. Civ. R. 101.1(4), an appearance of counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney of law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J.L.Civ.R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$150.00 fee required by D.N.J.L.Civ.R. 101(c)(3) for *pro hac vice* admission to the District Court for the District of New Jersey shall be payable within twenty (20) days of this Order. Payment in the form of a check must be made payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address, for forwarding by the Clerk of the District Court:

United State District Court
District of New Jersey
Clarkson S. Fisher Federal Building
and United States Courthouse
402 East State Street, Room 2020
Trenton, New Jersey 08608
Attention: Pro Hac Vice Admissions

And it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of the New Jersey Lawyers' Fund for Client Protection within five (5) days of its entry.

CERTIFICATE OF MAILING

I HEREBY CERTIFY that I served a copy of this Order on the applicant and the Treasurer of the New Jersey Lawyers' Fund for Client Protection, Richard J. Hughes Justice Complex, P.O. Box 961, Trenton, NJ 08625-0961 on _____, 2012.

James J. Waldron, Clerk